

# EXHIBIT C

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10/23/2018

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1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4

5 WENDELL SHANE MACKEY,  
6 Plaintiff,

7 vs. Case No. 2:17-cv-12359

8 Hon. Bernard A. Friedman

9 Mag. David R. Grand

10 JAMES MICHAEL BERRYMAN, Mayor  
11 of the City of Adrian,  
12 Michigan; MARGARET M.S. NOE,  
13 Judge of the Lenawee County  
14 Circuit Court,  
15 Defendants.

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19 The Videorecorded Deposition of  
20 JAMES MICHAEL BERRYMAN,  
21 Taken at 201 South Main Street, 5th Floor,  
22 Ann Arbor, Michigan,  
23 Commencing at 10:17 a.m.,  
24 Tuesday, October 23, 2018,  
25 Before Cheri L. Gleyre, CSR-6548.

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1 buildings, 29,000 in vehicles, that totals  
2 approximately 107,000?

3 A. If you say so.

4 Q. Okay. And this document further shows that you claim  
5 90,000 in depreciation, correct?

6 MR. GILLOOLY: Objection, relevance. What's  
7 this relevant to depreciation as called for in a civil  
8 rights lawsuit alleging he took out a PPO against your  
9 client in an exercise that shows his first amendment  
10 and other rights? Seriously. We're not going to do  
11 this all day, seriously.

12 MR. HADDAD: It goes to his credibility.

13 MR. GILLOOLY: His credibility?

14 MR. HADDAD: Yes.

15 BY MR. HADDAD:

16 Q. Now --

17 MR. GILLOOLY: You can't impeach him on  
18 something as credibility.

19 MR. HADDAD: No. Credibility is always  
20 relevant. No.

21 MR. GILLOOLY: Yeah, but you can't impeach  
22 him with regard to his credibility with a document  
23 that's 40 years old and completely unrelated to this  
24 incident.

25 MR. HADDAD: I'll make that determination.

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1           You can file your motion later.

2                       MR. GILLOOLY: Thank you, judge.

3 BY MR. HADDAD:

4 Q.    So moving on, you depreciate 84 percent of your assets  
5           in a single year, correct?

6 A.    I have no idea.

7 Q.    Okay. This is your signature on this document,  
8           correct?

9 A.    Correct.

10 Q.   And at the time you signed this as the president,  
11          correct?

12 A.    Correct.

13 Q.   And this is verifying that all the information on this  
14          document is true and accurate, correct?

15 A.    Correct.

16 Q.   Now, in one year it shows that you depreciated  
17          \$90,623, in a single year, correct?

18 A.    That's what it shows.

19 Q.   Okay. It's approximately 84 percent of the assets,  
20          correct?

21                   MR. GILLOOLY: Objection to the form of the  
22                   question. You can't expect him to do the math in his  
23                   head right there after you've scripted it out and used  
24                   your calculator. It's not a fair --

25                   MR. HADDAD: Okay. I'll move on.